

EXHIBIT G

From: Levy, Lindsey
Sent: Monday, January 27, 2025 9:46 PM
To: 'Tal J Lifshitz'; Harvey, Patrick A.
Cc: Josh Wackerly; Scherr, Jason R.; Compton Russian, Meredith Lynn; Joanne Cicala; Johan Conrod; Trey Watkins; Tanya Ellis; Lawrence Deas; William Liston III; Matthew McDonald; bbogle@levinlaw.com; sdaroci@seegerweiss.com; dbuchanan@seegerweiss.com; Benjamin Widlanski; mpifko@baronbudd.com; 'Sarah DeLoach'; ssacks@napolilaw.com; mdearman@rgrdlaw.com; probertson@irpinolaw.com; myeates@ktmc.com; Erich Schork; Jon Neumann; Matthew Gately; Kelly Rinehart; Mike Roberts; Brandon Sadowsky; Robert L. Salim; Karen Sharp Halbert Roberts Law Firm P.A.; Shelbi Flood; John Alden Meade; Lisa Causey-Streete; Ackerman, Ethan; Lea Bays
Subject: RE: Insulin Pricing MDL - Recap re meet and confer on Express Scripts discovery responses

Tal,

We are amenable to further conversation regarding Plaintiffs' proposal. Unfortunately, given competing obligations/deadlines, we were not available today.

I'll preview that while we reject that Plaintiffs have any right to condition our use of TAR, several of Plaintiffs' conditions are consistent with the approaches we plan to employ—including our use of Brainspace's standard inclusion/exclusion criteria and intent to use Brainspace's conceptual diversity/diverse active training features in appropriate intervals throughout the review. However, we are not aligned on other aspects of Plaintiffs' proposal, some of which we may be able to iron out through further discussion if it will enable us to resolve your objections as part of an overall agreement. To help facilitate that discussion, it would be helpful if plaintiffs would provide their counter proposal regarding custodians, as that will naturally impact the size of the universe for review and our evaluation of burden/proportionality. Do plaintiffs anticipate being in a position to send their custodian counterproposal this week? If so, we could try and set aside time to discuss plaintiffs' proposal on Thursday or Friday.

Best,
Lindsey

Lindsey Levy

Pronouns: She/Her/Hers

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From: Tal J Lifshitz <tjl@kttlaw.com>
Sent: Friday, January 24, 2025 2:20 PM
To: Levy, Lindsey <lindsey.levy@morganlewis.com>; Harvey, Patrick A. <patrick.harvey@morganlewis.com>
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